

FILED

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

MAY 21 2002

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA)

v.)

JOHN P. WILLIAMS)

DOCKETED

MAY 22 2002

02CR0509
Viol. of Title 18,
United States Code,
Sections 2 and 1344

COUNT ONE

JUDGE GETTLEMAN

The SPECIAL FEBRUARY 2002-1 GRAND JURY charges:

1. At times material to this indictment:

MAGISTRATE JUDGE DENLOW

(a) The following institutions were financial institutions, the deposits of which were insured by the Federal Deposit Insurance Corporation: (1) Citibank F.S.B. ("Citibank"), located in Chicago, Illinois; and (2) St. Paul Federal Bank for Savings ("St. Paul Bank"), located in Chicago, Illinois.

2. From in or about June 1995 through in or about May 1997, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

JOHN P. WILLIAMS,

defendant herein, knowingly executed and attempted to execute a scheme to defraud Citibank and St. Paul Bank, and to obtain monies and funds owned by and under custody and control of those banks, by means of materially false and fraudulent pretenses, representations, promises, and omissions, which scheme to defraud is further described in the following paragraphs.

3. It was part of the scheme that defendant JOHN P. WILLIAMS recruited and caused others to recruit individuals to open accounts at Citibank.

4. It was further part of the scheme that, once the individuals opened the bank accounts, defendant JOHN P. WILLIAMS caused the deposit of stolen and forged checks into the accounts for the purpose of fraudulently inflating the balance in the accounts.

5. It was further part of the scheme that, once the stolen and forged checks were deposited into the bank accounts, defendant JOHN P. WILLIAMS withdrew funds from the accounts and caused others to withdraw funds from the accounts so that the funds could be converted for his own use and the use of the individuals who withdrew the funds.

6. It was further part of the scheme that defendant JOHN P. WILLIAMS concealed, misrepresented, and hid and caused to be concealed, misrepresented, and hidden, the existence and purpose of the scheme and the acts done in furtherance of the scheme.

7. As a result of the scheme to defraud, the defendant caused the deposit of over sixty (60) stolen and forged checks and caused losses to Citibank of at least \$100,000.

8. On or about April 24, 1996, at Chicago, in the Northern District of Illinois, Eastern Division,

JOHN P. WILLIAMS,

defendant herein, did knowingly execute and attempt to execute the above-described scheme to defraud by depositing a forged and fraudulent \$6,000 check into a Citibank savings account in the name of Individual D knowing that the check was forged and fraudulent;

In violation of Title 18, United States Code, Sections 2 and
1344.

COUNT TWO

The SPECIAL FEBRUARY 2002-1 GRAND JURY further charges:

1. The allegations contained in paragraphs 1 through 7 of Count One of this indictment are realleged and incorporated here as if fully set forth.

2. On or about April 26, 1996, at Chicago, in the Northern District of Illinois, Eastern Division,

JOHN P. WILLIAMS,

defendant herein, did knowingly execute and attempt to execute the above-described scheme to defraud by depositing a forged and fraudulent \$6,000 check into a Citibank savings account in the name of Individual D knowing that the check was forged and fraudulent;

In violation of Title 18, United States Code, Sections 2 and 1344.

COUNT THREE

The FEBRUARY 2002-1 GRAND JURY further charges:

1. The allegations contained in paragraphs 1 through 7 of Count One of this indictment are realleged and incorporated here as if fully set forth.

2. On or about April 26, 1996, at Chicago, in the Northern District of Illinois, Eastern Division,

JOHN P. WILLIAMS,

defendant herein, did knowingly execute and attempt to execute the above-described scheme to defraud by withdrawing \$2,800 of the fraudulently created balance as a result of the scheme from a Citibank savings account in the name of Individual D;

In violation of Title 18, United States Code, Sections 2 and 1344.

COUNT FOUR

The FEBRUARY 2002-1 GRAND JURY further charges:

1. The allegations contained in paragraphs 1 through 7 of Count One of this indictment are realleged and incorporated here as if fully set forth.

2. On or about April 26, 1996, at Chicago, in the Northern District of Illinois, Eastern Division,

JOHN P. WILLIAMS,

defendant herein, did knowingly execute and attempt to execute the above-described scheme to defraud by withdrawing \$2,000 of the fraudulently created balance as a result of the scheme from a Citibank savings account in the name of Individual D;

In violation of Title 18, United States Code, Sections 2 and 1344.

COUNT FIVE

The FEBRUARY 2002-1 GRAND JURY further charges:

1. The allegations contained in paragraphs 1 through 7 of Count One of this indictment are realleged and incorporated here as if fully set forth.

2. On or about April 26, 1996, at Chicago, in the Northern District of Illinois, Eastern Division,

JOHN P. WILLIAMS,

defendant herein, did knowingly execute and attempt to execute the above-described scheme to defraud by withdrawing \$800 of the fraudulently created balance as a result of the scheme from a Citibank savings account in the name of Individual D;

In violation of Title 18, United States Code, Sections 2 and 1344.

COUNT SIX

The FEBRUARY 2002-1 GRAND JURY further charges:

1. The allegations contained in paragraphs 1 through 7 of Count One of this indictment are realleged and incorporated here as if fully set forth.

2. On or about April 26, 1996, at Chicago, in the Northern District of Illinois, Eastern Division,

JOHN P. WILLIAMS,

defendant herein, did knowingly execute and attempt to execute the above-described scheme to defraud by withdrawing \$600 of the fraudulently created balance as a result of the scheme from a Citibank savings account in the name of Individual D;

In violation of Title 18, United States Code, Sections 2 and 1344.

A TRUE BILL:


FOREPERSON


UNITED STATES ATTORNEY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

VS.

JOHN WILLIAMS

I N D I C T M E N T

Violation:
18 U.S.C., § 1344

A true bill,



Foreman

Filed in open court this 21st day of May, A.D. 2002

MICHAEL W. DOEBINS



Clerk

Bail, \$